

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK**

PAUL D. CEGLIA,

Plaintiff,

vs.

ERIC HIMPTON HOLDER, JR., individually
and as Attorney General of the United States,
PREETINDER S. BHARARA, individually
and as US Attorney for the Southern District
of New York, JANIS M. ECHENBERG
and CHRISTOPHER D. FRYE, individually
and in their capacity as representatives of the US
Attorney's Office for the Southern District of New
York,

Defendants.

Civil Action No.:1:13-cv-00256-RJA

**MOTION FOR EXPEDITED
DISCOVERY IN ADVANCE OF
HEARING ON PRELIMINARY
INJUNCTION AND FOR AN
EXPEDITED TELEPHONIC
CONFERENCE WITH
COUNSEL TO SET THE
DISCOVERY SCHEDULE**

Plaintiff, Paul D. Ceglia, hereby moves this Honorable Court for an order permitting him to take, in advance of the preliminary injunction hearing scheduled for May 10, 2013, the deposition of Mark Zuckerberg, a defendant in the underlying civil litigation brought by plaintiff upon which the criminal indictment is based.

In support of this motion, plaintiff relies upon his Memorandum of Law in Support of Motion for Expedited Discovery in Advance of Hearing on Preliminary Injunction and for an Expedited Telephonic Conference with Counsel to Set the Discovery Schedule, the Declaration of Paul A. Argentieri in support of this motion and the previously filed Verified Complaint.

Dated: April 25, 2013
Buffalo, New York

Respectfully submitted,

s/ Robert Ross Fogg
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